

EXHIBIT B

BOIESSCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)

mmao@bsflp.com

Beko Reblitz-Richardson (CA Bar No. 238027)

brichardson@bsflp.com

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Telephone: (415) 293 6858

Facsimile: (415) 999 9695

SUSMAN GODFREY L.L.P.

William Christopher Carmody (*pro hac vice*)

bcarmody@susmangodfrey.com

Shawn J. Rabin (*pro hac vice*)

srabin@susmangodfrey.com

1301 Avenue of the Americas, 32nd Floor

New York, NY 10019

Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (*pro hac vice*)

jyanchunis@forthepeople.com

Ryan J. McGee (*pro hac vice*)

rmcgee@forthepeople.com

201 N. Franklin Street, 7th Floor

Tampa, FL 33602

Telephone: (813) 223-5505

Attorneys for Plaintiffs; additional counsel

listed in signature blocks below

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC

Defendants.

WILLKIE FARR & GALLAGHER LLP

Benedict Y. Hur (SBN: 224018)

bhur@willkie.com

Simona Agnolucci (SBN: 246943)

sagnolucci@willkie.com

Eduardo E. Santacana (SBN: 281668)

esantacana@willkie.com

Lori Arakaki (SBN: 315119)

larakaki@willkie.com

~~Amanda Maya Argemira Florez~~ (SBN:
324092311153)

~~amaya@willkie.com~~

~~aflorez@willkie.com~~

One Front Street, 34th Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Facsimile: (415) 858-7599

Attorneys for Defendant Google LLC

Case No. 3:20-cv-4688-RS

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DISCOVERY
DEADLINES**

Judge: Hon. Richard Seeborg

Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into by and between Plaintiffs Anibal Rodriguez, et al and Defendant Google LLC (collectively, the "Parties").

WHEREAS, the parties have been working to complete discovery in this case pursuant to the Court's deadlines, and

WHEREAS, ~~given the complexity of pleadings have not yet been settled, and~~

WHEREAS, the case and the amount of discovery that remains in the case, the parties agree to an extension of the schedule allows for some flexibility in the fact discovery ~~deadline~~ and expert disclosure ~~date~~ deadlines without moving any other deadlines in the case, and

WHEREAS, ~~given the possibility that~~ the scope of discovery may change depending on the Court's ruling on Google's pending motion to dismiss (Dkt. ~~115~~) ~~the parties agree to negotiate a second extension as needed after the Court has issued an order on the pending motion to dismiss.~~ 115), and

WHEREAS, the parties agree to negotiate in good faith whether and to what extent a second extension may be needed after the Court has issued an order on the pending motion to dismiss, and

WHEREAS, there have been no other extensions of the case schedule set by the Court;

NOW THEREFORE, the parties agree to the following:

- The parties agree to extend the fact discovery deadline (Dkt. 59) by 60 days to January 11, 2022.
- The parties agree to extend the expert disclosure date, which is currently set on December 13, 2021 (Dkt. 59), to January 11, 2022, to match the new discovery deadline.
- After the Court has issued an order on the pending motion to dismiss, the parties agree to ~~negotiate all~~ meet and confer regarding other deadlines as needed.

DATED: August 4, 2021

By: /s/ Draft

BOIES SCHILLER FLEXNER LLP
Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor

San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

James W. Lee (pro hac vice)
jlee@bsflp.com
Rossana Baeza (pro hac vice)
rbaeza@bsflp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Telephone: (305) 539-8400
Facsimile: (305) 539-1304

Jesse Panuccio (pro hac vice)
jpanuccio@bsflp.com
1401 New York Ave, NW
Washington, DC 20005
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

SUSMAN GODFREY L.L.P.

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
Steven Shepard (pro hac vice)
sshepard@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
Ra Olusegun Amen (pro hac vice)
ramen@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

Attorneys for Plaintiffs

DATED: August 3, 2021

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Draft

Benedict Y. Hur (SBN: 224018)

bhur@willkie.com

Simona Agnolucci (SBN: 246943)

sagnolucci@willkie.com

Eduardo E. Santacana (SBN: 281668)

esantacana@willkie.com

Lori Arakaki (SBN: 315119)

larakaki@willkie.com

~~Amanda~~ Maya Argemira Florez (SBN:
~~324092311153~~)

~~amaya@willkie.com~~

~~aflorez@willkie.com~~

One Front Street, 34th Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Facsimile: (415) 858-7599

Attorneys for Defendant Google LLC

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**

3
4 ANIBAL RODRIGUEZ, JULIEANNA
5 MUNIZ, ELIZA CAMBAY, SAL CATALDO,
6 EMIR GOENAGA, JULIAN SANTIAGO,
7 HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

8 Plaintiffs,

9 vs.

10 GOOGLE LLC

11 Defendants

Case No. 3:20-cv-4688-RS

[PROPOSED] ORDER

12
13 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the discovery
14 deadline and expert disclosure deadline are extended until January 11, 2022.

15
16 **IT IS SO ORDERED.**

17
18
19 Dated: _____

The Honorable Richard Seeborg